

Mr. John Dolecki  
FIC America Corporation  
485 E Lies Road  
Carol Stream, Illinois 60188

Dear Mr. Dolecki:

Re: Exempt Construction and Operation Status,  
083-14894-00045

The application from FIC America Indiana, received on October 3, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission units, to be located at 3320 South Keller Road, Vincent, Indiana 47591, is classified as exempt from air pollution permit requirements:

- (a) Forty-seven (47) robotic MIG welders, with a maximum rate of 0.58 lbs/hr per station.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the welding units shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

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cc: File - Knox County  
Knox County Health Department  
Air Compliance - Scott Anslinger  
Southwest Regional Office  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

# **Indiana Department of Environmental Management Office of Air Quality**

## **Technical Support Document (TSD) for an Exemption**

### **Source Background and Description**

**Source Name:** FIC America Corporation  
**Source Location:** 3320 South Keller Road, Vincent, Indiana 47591  
**County:** Knox  
**SIC Code:** 3469  
**Operation Permit No.:** 083-14894-00045  
**Permit Reviewer:** Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed an application from FIC America Corporation relating to the construction and operation of robotic MIG welders and automatic, robotic and manual resistance spot welders.

### **New Emission Units and Pollution Control Equipment**

The source consists of the following emission units and pollution control devices:

- (a) Forty-seven (47) robotic MIG welders, with a maximum rate of 0.58 lbs/hr per station.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on October 3, 2001.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations.

### **Potential To Emit of Cleaning Furnace**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.66
PM-10	0.66
SO <sub>2</sub>	negligible
VOC	negligible
CO	negligible
NO <sub>x</sub>	negligible
HAPs	0.06

- a. The potential to emit (as defined in 326 IAC 2-7-1 (29) of PM, PM<sub>10</sub>, is less than five (5) tons, and less than ten (10) tons per year of other criteria pollutants, as well as less than twenty-five (25) tons per year of CO. Therefore, the source is not subject to the provisions of 326 IAC 2-5.

#### County Attainment Status

The source is located in Knox County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Knox County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Knox County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- b. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the Potential to Emit of CO, VOC, NOx, PM-10, and SO2 is less than one hundred (100) tons per year.

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the welding units shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### **Conclusion**

The construction and operation of the welding units shall be subject to the conditions of the attached proposed Exemption 083-14894-00045.